

**From:** [Belke, Jim](#)  
**To:** [EOC Public Information](#); [Graham, Amy](#); [Grantham, Nancy](#); [Davis, Patrick](#)  
**Cc:** [Abboud, Michael](#); [Bowman, Liz](#); [Gray, David](#)  
**Subject:** RE: Arkema RMP  
**Date:** Thursday, August 31, 2017 2:19:35 PM  
**Attachments:** [RMP Report \(non OCA\) Arkema Crosby TX.pdf](#)

---

One suggested minor edit (strikeout) in first answer below. Releasable RMP (non OCA version) is attached.

---

**From:** EOC Public Information

**Sent:** Thursday, August 31, 2017 3:15 PM

**To:** Graham, Amy ; Grantham, Nancy ; Davis, Patrick

**Cc:** Abboud, Michael ; Bowman, Liz ; Gray, David ; Belke, Jim

**Subject:** Re: Arkema RMP

here's the draft response to the questions below (except for enforcement):

**Does EPA have a list of chemicals of concern at the Arkema Crosby site?**

Response: The facility is required to submit a Risk Management Plan because it handles the following chemicals above the regulatory threshold quantity: 2-methylpropene and sulfur dioxide. 2-methylpropene is a regulated flammable chemical with a threshold quantity of 10,000 pounds, and sulfur dioxide is a regulated toxic chemical with a ~~reportable~~ threshold quantity of 5000 pounds. The facility also handles additional chemicals that are not regulated under the RMP regulation. These include various organic peroxides and other raw chemical feedstocks.

- **Are there other petrochemical facilities in the flooded areas that EPA is monitoring or concerned about? Any others in danger of exploding or catching on fire?** EPA is working with TCEQ to contact industrial sources within the impacted area to determine their operational status and what support can be provided with the monitoring of the start-up of industrial sources along the coast of Texas.
- **Any enforcement actions taken against Arkema involving its U.S. operations? Details?** No recent EPA RMP enforcement actions have been taken against the Crosby facility.
- **Please provide a copy of the most recent Risk Management Plan for the Crosby plant. There is reference to a 2014 plan online. Is that the most recent? Do they have to file these things every year?**

Response: Facilities are required to submit Risk Management Plans every five years, unless major changes at the facility trigger an earlier update. The 2014 Plan for the Arkema facility is the current plan. (tracking down the 2014 plan as well)

- **I'm just trying to confirm that the Arkema Crosby facility that exploded this morning is covered by the EPA's risk management program? YES. And therefore would have had tighter safety rules if the new Risk Management Program rule had gone into effect as originally scheduled in March?** The agency's recent actions regarding the risk management plan requirements had no effect whatsoever on the major requirements that were in effect at the Arkema Crosby plant at the time of the explosion. The new rule completed at the end of the last Administration did not change any of those requirements immediately – the first change would not have occurred until March 2018. While the agency did recently act to delay one provision of that rule to be more consistent with the timing of other changes occurring further into the future, that provision required annual coordination between

regulated facilities and local emergency responders and Arkema's RMP for the Crosby facility indicates they already have coordinated with the local emergency responders (the fire department). The organic peroxide chemicals involved in the explosion on 8/31/17 are not covered under the Risk Management Program regulations.

- **I'm working on a story about why Arkema is allowed to refuse to release the company's federally mandated risk management plan.** RMP-regulated facilities may voluntarily release their risk management plan, but they are not required to do so. Some facilities choose not to release the full plan because portions of the plan contain sensitive information concerning the facility's offsite consequence analysis (i.e., hypothetical worst case and alternative release scenarios). Members of the public may obtain access to complete risk management plans by visiting a Federal risk management plan reading room. A redacted version of the facility risk management plan (without the sensitive offsite consequence analysis information) is available for release to the media.

---

**From:** Graham, Amy

**Sent:** Thursday, August 31, 2017 1:55 PM

**To:** EOC Public Information; Grantham, Nancy; Davis, Patrick

**Cc:** Abboud, Michael; Bowman, Liz; Gray, David

**Subject:** RE: Arkema RMP

Another question to track down: Is there someone who could speak with me this afternoon about what exactly chemical plants are required to file with the EPA and to report publicly?

---

**From:** EOC Public Information

**Sent:** Thursday, August 31, 2017 1:06 PM

**To:** Grantham, Nancy <[Grantham.Nancy@epa.gov](mailto:Grantham.Nancy@epa.gov)>; Graham, Amy <[graham.amy@epa.gov](mailto:graham.amy@epa.gov)>; Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>

**Cc:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; Bowman, Liz <[Bowman.Liz@epa.gov](mailto:Bowman.Liz@epa.gov)>; EOC Public Information <[EOC\\_Public\\_Information@epa.gov](mailto:EOC_Public_Information@epa.gov)>

**Subject:** RE: Arkema RMP

R6 is working on these questions. EOC Manager is contacting them now for a status report. Will keep u posted

---

**From:** Grantham, Nancy

**Sent:** Thursday, August 31, 2017 1:03 PM

**To:** Graham, Amy <[graham.amy@epa.gov](mailto:graham.amy@epa.gov)>; Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>

**Cc:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; Bowman, Liz <[Bowman.Liz@epa.gov](mailto:Bowman.Liz@epa.gov)>; EOC Public Information <[EOC\\_Public\\_Information@epa.gov](mailto:EOC_Public_Information@epa.gov)>

**Subject:** RE: Arkema RMP

Looping in the eoc pio as I think they may be working some of this already. Laura, can you connect with Patrick Davis? Thanks ng

**Nancy Grantham**  
**Office of Public Affairs**  
**US Environmental Protection Agency**  
**202-564-6879 (desk)**  
**202-253-7056 (mobile)**

---

**From:** Graham, Amy

**Sent:** Thursday, August 31, 2017 1:01 PM

**To:** Davis, Patrick <[davis.patrick@epa.gov](mailto:davis.patrick@epa.gov)>

**Cc:** Abboud, Michael <[abboud.michael@epa.gov](mailto:abboud.michael@epa.gov)>; Grantham, Nancy <[Grantham.Nancy@epa.gov](mailto:Grantham.Nancy@epa.gov)>; Bowman, Liz <[Bowman.Liz@epa.gov](mailto:Bowman.Liz@epa.gov)>

**Subject:** Arkema RMP

Hi Patrick – We are receiving a lot of questions about the Arkema facility's RMP. A sampling of some of the questions are below. Can you help with these?

- Does EPA have a list of chemicals of concern at the Arkema Crosby site?
- Are there other petrochemical facilities in the flooded areas that EPA is monitoring or concerned about? Any others in danger of exploding or catching on fire?
- Any enforcement actions taken against Arkema involving its U.S. operations? Details?
- Please provide a copy of the most recent Risk Management Plan for the Crosby plant. There is reference to a 2014 plan online. Is that the most recent? Do they have to file these things every year?
- I'm just trying to confirm that the Arkema Crosby facility that exploded this morning is covered by the EPA's risk management program? And therefore would have had tighter safety rules if the new Risk Management Program rule had gone into effect as originally scheduled in March?
- I'm working on a story about why Arkema is allowed to refuse to release the company's federally mandated risk management plan.